

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

CONGHUA YAN,	§	CIVIL ACTION 4-23 CV-758-P
	§	
Plaintiff	§	
	§	
Versus	§	
	§	
THE STATE BAR OF TEXAS, et al.	§	

DEFENDANT’S ANSWER TO THIRD AMENDED COMPLAINT

NOW COMES Defendant William Albert Pigg who, for Answer to the Third Amended Complaint of Plaintiff, Conghua Yan, responds as follows:

1. The allegations contained in the unnumbered paragraphs prior to Section I of Plaintiff’s Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.
2. The allegations contained in Section I, numbered paragraphs 1, and 4 – 18 of Plaintiff’s Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.
3. The allegations contained in Section I, numbered paragraphs 2 and 3 of Plaintiff’s Third Amended Complaint are denied in their entirety.
4. The allegations contained in Section II, numbered paragraphs 1-6 [sic] of Plaintiff’s Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.
5. The allegations contained in Section III, numbered paragraphs 7-10 and 12-18 of Plaintiff’s Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

6. In answer to Section III, numbered paragraph 11 of Plaintiff's Third Amended Complaint, Defendant admits he is a member of the State Bar of Texas, Bar Card Number 24057009. The remaining allegations contained in Section III, numbered paragraph 11 of Plaintiff's Third Amended Complaint require no answer by this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

7. The allegations contained in Section IV A, numbered paragraphs 19 – 44 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

8. The allegations contained in Section IV B, numbered paragraphs 45 - 49 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

9. The allegations contained in Section IV C, numbered paragraphs 50 - 56 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

10. The allegations contained in Section IV D, numbered paragraphs 57 - 64 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

11. The allegations contained in Section IV E, numbered paragraphs 65 - 67 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

12. The allegations contained in Section IV F, numbered paragraphs 68, 69, 71, 73, and 75-78 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant.

To the extent an answer may be required, the allegations contained therein are denied in their entirety.

13. The allegations contained in Section IV F, numbered paragraphs 70, 72, and 74, of Plaintiff's Third Amended Complaint are denied in their entirety.

14. The allegations contained in Section V A, numbered paragraphs 79-89, 91, 92, 94, 95, 97, 103, 106, and 109 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

15. The allegations contained in Section V A, numbered paragraphs 92, 96, 98-102, 104, 105, 107, and 108 of Plaintiff's Third Amended Complaint are denied in their entirety.

16. The allegations contained in Section V A, numbered paragraphs 90 and 93 requires no answer of this responding Defendant except to admit that he appeared in Court on April 13, 2022. To the extent a further answer may be required, the remaining allegations contained therein are denied in their entirety.

17. The allegations contained in Section V B, numbered paragraphs 110-114, and 116-126 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

18. In answer to the allegations contained in Section V B, numbered paragraph 115, Defendant admits that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. The remaining allegations contained in Section V B, numbered paragraph 115 are denied in their entirety.

19. The allegations contained in Section VI, numbered paragraphs 127-135 of Plaintiff's Third Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

20. The allegations contained in Section VII, First Claim for Relief, numbered paragraphs 136-161, 166, 168-170, 172, and 174-176 require no answer of this responding Defendant except to admit that Defendant is a member of the State Bar of Texas. To the extent further answer may be required, the allegations contained therein are denied in their entirety.

21. The allegations contained in Section VII, First Claim for Relief, numbered paragraphs 162-165, 167, 171, and 178 of Plaintiff's Third Amended Complaint are denied in their entirety.

22. In response to the allegations contained in Section VII, First Claim for Relief, numbered paragraph 173, Defendant admits that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. The remaining allegations contained in Section VI, Second Claim for Relief, numbered paragraph 173 are denied in their entirety.

23. The allegations contained in Section VII, First Claim for Relief, Injuries, numbered paragraphs 177, 178, and 180 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

24. The allegations contained in Section VII, First Claim for Relief, Injuries, numbered paragraph 179 are denied in their entirety.

25. The allegations contained in Section VII, First for Relief, Reliefs [sic], numbered paragraphs 181-204 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

26. The allegations contained in Section VII, Second Claim for Relief, numbered paragraphs 205-213 require no answer of this responding Defendant, except to admit that he is a member of the State Bar of Texas. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

27. The allegations contained in Section VII, Second Claim for Relief, Trade and Commerce, numbered paragraphs 213-216 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

28. The allegations contained in Section VII, Second Claim for Relief, Argument in Monopoly, numbered paragraphs 217-243 require no answer of this responding Defendant, except to admit that he did not submit “any billable hours or rates” into the [second] hearing and to deny that he never submitted any pleading (See paragraph 226). To the extent a further answer may be required, the allegations contained in Section VI, Second Claim for Relief, Argument in Monopoly, numbered paragraphs 217-243 are denied in their entirety.

29. The allegations contained in Section VII, Second Claim for Relief, Effects and Injuries, numbered paragraphs 244-253 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

30. The allegations contained in Section VII, Second Claim for Relief, Reliefs [sic], numbered paragraphs 254-275 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

31. The allegations contained in Section VII, Third Claim for Relief, numbered paragraphs 276-296 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

32. The allegations contained in Section VII, Fourth Claim for Relief, numbered paragraphs 297-313 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

33. The allegations contained in Section VII, Fifth Claim for Relief, numbered paragraphs 314-318 and 326-332 require no answer of this responding Defendant, except to admit that he is a member of the State Bar of Texas, Bar Card Number 24057009. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

34. The allegations contained in Section VII, Fifth Claim for Relief, numbered paragraphs 319-325 are denied in their entirety.

35. The allegations contained in Section VII, numbered paragraphs 333-353 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

36. The allegations contained in Section VII, Seventh [sic] Claim for Relief, numbered paragraphs 354-373 require no answer of this responding Defendant, except to admit that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

37. The allegations contained in Section VII, Eighth Claim for Relief, numbered paragraphs 374-393 require no answer of this responding Defendant, except to admit that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

38. The allegations contained in Section VII, Ninth Claim for Relief, numbered paragraphs 394-413 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

39. The allegations contained in Section VII, Ninth Claim for Relief, Relief [sic], numbered paragraphs 414-424 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

40. The allegations contained in Plaintiff's Prayer for Relief, numbered paragraphs 425-434 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

WHEREFORE, Defendant William A. Pigg prays that this, his Answer to Plaintiff's Third Amended Complaint, be deemed good and sufficient in law and that after due proceedings are had, there be judgment herein in favor of Defendant William A. Pigg and against Plaintiff, Conghua Yan, dismissing his claims in their entirety, and for all general and equitable relief.

Respectfully Submitted

WILIAM A. PIGG, PLLC

s/ William A. Pigg

SBN 24057009

wapigg@pigglawfirm.com

/s/ Charles L. Woods

SBN 21952660

clwoods@pigglawfirm.com

10455 N. Central Expressway, Suite 109

Dallas, Texas 75231

Tel. (214) 551-9391

Fax (214) 602-8832

Attorneys for William A. Pigg

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on Plaintiff Conghua Yan through the Court's electronic filing system this 21st day of September, 2023.

/s/ William A. Pigg